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**VIA ECF**

The Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Ayeni and Solomon*, 23 Cr. 274 (AT)**

Dear Judge Torres:

This letter regards my representation of the above-captioned defendant, Mr. Jameel Solomon, who I was appointed to represent in June 2023. As the court is aware, as of June 14, 2023, Mr. Solomon's initial bail conditions were set as follows: \$100,000 PRB cosigned by two financially responsible persons, travel restricted to the Southern and Eastern Districts of New York, surrender travel documents and no new applications, supervision as directed by pretrial services, keep seeking employment and have no contact with co-defendants, victims, or witnesses except in the presence of counsel, no possession of personal identifying information of others except immediate family members, no opening any new financial accounts or lines of credit without approval of pretrial services, and GPS stand alone monitoring in place until the defendant surrenders his passport. The expectation was that Mr. Solomon was to be released to meet the remaining conditions by June 28, 2023.

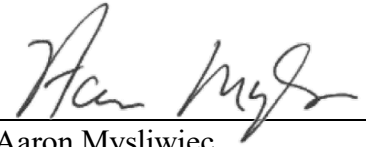
Unfortunately, after many attempts, Mr. Solomon has remained unable to locate his passport. Accordingly, he officially reported his passport as lost. *See* Letter of U.S. Department of State, Consular Lost and Stolen Passport Unit dated to October 6, 2023 (attached as "Exhibit A"). Because Mr. Solomon's travel document is now considered invalid, I write to respectfully request that the Court amend Mr. Solomon's bail conditions such that he be permitted to remove the GPS stand alone monitoring for the remainder of his time out on bail. Mr. Solomon has remained under pretrial supervision without incident since June 14, 2023, with the only issue being these continued attempts to find his passport.

Because of all the reasons outlined in this letter, Mr. Solomon is a good candidate for an amendment of his bail conditions – specifically via the revocation of GPS monitoring services.

After reviewing Mr. Solomon's documentation from the U.S. Department of State, the government, through AUSA Elizabeth Daniels, informed me that it had no objection to an application for Mr. Solomon's bracelet removal, pending Pretrial's approval. Subsequently, the U.S. Department of Pretrial Services, through Officer Ashley L. Cosme, indicated that it has no objection to this request.

Thank you for the Court's consideration.

Respectfully submitted,



Aaron Mysliwiec  
*Attorney for Jameel Solomon*

cc: AUSA Elizabeth Daniels  
*via email*

GRANTED.

SO ORDERED.

Dated: October 19, 2023  
New York, New York



ANALISA TORRES  
United States District Judge